IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of

Dinesh C. VERMA

Serial No: 09/932,735

Filed: August 17, 2001

For: USER INFORMATION COORDINATION ACROSS
      MULTIPLE DOMAINS

Examiner: AILES, Benjamin

Art Unit: 2142

APPEAL BRIEF

Board of Patent Appeals and Interferences
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

    The Appellant submits this brief pursuant to 37 C.F.R.
§41.37(a)(1) in furtherance of the Notice of Appeal filed November
29, 2007.

    Please charge Deposit Account 50-0510 the $510 fee for filing
this Appeal Brief. No other fee is believed due with this Appeal
Brief, however, should another fee be required please charge Deposit
Account 50-0510.

Real Party in Interest

    The real party in interest with respect to the present
application is International Business Machines Corporation.

Related Appeals and Interferences

    The Appellants' legal representative does not know of any other
appeal, interference or judicial proceeding which will affect or be
directly affected by or have bearing on the Board's decision in the
pending appeal.

Status of Claims

Claims 1-35 are pending in the present application, with claims 1, 7, 11, 14, 18 and 21 being independent claims. Claims 1-35 are currently finally rejected and are the subject of this appeal.

Status of Amendments

No amendments to the claims were made after the Final Office Action dated August 29, 2007 ("FOA").

Summary of the Claimed Subject Matter

Claim 1 recites a method comprises the operation of employing a first web server in a first DNS domain, and a second web server in a second DNS domain. App., pp. 16, ll. 3-6, Fig. 5, items 510 and 520. The first web server uses a first user tracking mechanism to collect client information and stores the client information as a client record in a database. App., pp. 13, ll. 6-8 and 11-16, Fig. 3, steps 303 and 307. See also App., pp. 16, ll. 6-9, Fig. 5, item 512. The first web server directing a client to access a resource at the second Web-Server. App., pp. 13, ll. 16-17, Fig. 3, step 309. See also App., pp. 16, ll. 9-11, Fig. 5, item 530. Said resource encapsulating information about a location of the client record in the database. App., pp. 13, ll. 8-12, Fig. 3, step 305. See also App., pp. 16, ll. 12-14, Fig. 5, item 514. The second web server decapsulating the location and retrieving the client record from the database. App., pp. 13, ll. 22-24, Fig. 4, step 403. See also App., pp. 16, ll. 14-16, Fig. 5, item 540. The second web server using the client record in conjunction with a second user tracking mechanism. App., pp. 13, ll. 24-28, Fig. 4, step 405. See also App., pp. 16, ll. 16-19, Fig. 5, item 550.

Claim 7 recites a method that comprises employing a first web server in a first DNS domain, and a second web server in a second DNS domain. App., pp. 16, ll. 4-6, Fig. 5, items 510 and 520. The method further comprises enabling said first and second web servers to share cookie information. App., pp. 4, ll. 18-21; pp 11, ll. 23 – pp. 12, ll. 10. The method further comprises coordinating cookies across said first and

second domains. App., pp. 4, ll. 22-26; pp. 11, ll. 23 – pp. 12, ll. 10,
Fig. 2, item 207. The method further comprises storing a client record in
a database by the first web server. App., pp. 13, ll. 6-8, Fig. 3, step
303. See also App., pp. 16, ll. 6-9. The method further comprises
creating a link to the second web server that encapsulates information
about a location of the client record in the database. App., pp. 13, ll.
8-12, Fig. 3, step 305. See also App., pp. 16, ll. 9-14, Fig. 5, items
514 and 530.

     Claim 11 recites an apparatus. The apparatus comprises means for
employing a first web server in a first DNS domain, and a second web
server in a second DNS domain. App., pp. 16, ll. 4-6, Fig. 5, items 510
and 520. The first web server uses a first user tracking mechanism to
collect client information and stores the client information as a client
record in a database. App., pp. 16, ll. 6-9, Fig. 5, item 512. See also
App., pp. 13, ll. 6-8 and 12-16, Fig. 3, steps 303 and 307. The apparatus
further comprises means for the first web server directing a client to
access a resource at the second web server. App., pp. 16, ll. 9-11, Fig.
5, item 530. See also App., pp. 13, ll. 16-17, Fig. 3, step 309. The
apparatus further comprises means for said resource encapsulating
information about a location of the client record in the database. App.,
pp. 16, ll. 12-14, Fig. 5, item 514. See also App., pp. 13, ll. 8-12,
Fig. 3, item 305. The apparatus further comprises means for the second
web server decapsulating the location and retrieving the client record
from the database. App., pp. 16, ll. 14-16, Fig. 5, item 540. See also
App., pp. 13, ll. 22-24, Fig. 4, step 403. The apparatus further
comprises means for the second web server using the client record in
conjunction with a second user tracking mechanism. App., pp. 16, ll. 16-
19, Fig. 5, item 550. See also App., pp. 13, ll. 24-28, Fig. 4, step 405.

     Claim 14 recites a comprising employing a first user tracker in a
first domain, and a second user tracker in a second domain. App., pp. 16,
ll. 4-7 and 16-17, Fig. 5, items 512 and 550. The first user tracker uses
a first user tracking mechanism to collect client information and stores
the client information as a client record in a database. App., pp. 13,
ll. 6-8 and 12-16, Fig. 3, steps 303 and 307; pp. 4, ll. 10-13. See also
App., pp. 16, ll. 6-9, Fig. 5, item 512. The first user tracker directing

a client to access a resource at the second user tracker. App., pp. 13,
ll. 16-17, Fig. 3, step 309; pp. 4, ll. 10-13. See also App., pp. 16, ll.
9-11, Fig. 5, item 530. Said resource encapsulating information about a
location of the client record in the database. App., pp. 13, ll. 8-12,
Fig. 3, step 305. See also App., pp. 16, ll. 12-14, Fig. 5, item 514.
The second user tracker decapsulating the location and retrieving the
client record from the database. App., pp. 13, ll. 22-24, Fig. 4, step
403; pp. 4, ll. 10-13. See also App., pp. 16, ll. 14-16, Fig. 5, item
540. The second user tracker using the client record in conjunction with
a second user tracking mechanism. App., pp. 13, ll. 24-28, Fig. 4, step
405; pp. 4, ll. 10-13. See also App., pp. 16, ll. 16-19, Fig. 5, item
550.

     Claim 18 also recites a method. The method comprises employing
a first web server in a first DNS domain, and a second web server in
a second DNS domain. App., pp. 16, ll. 4-6, Fig. 5, items 510 and
520. The first web server maintains a first private cookie at a
browser. App., pp. 11, ll. 25-26, Fig. 2, item 203; pp. 15, ll. 8-9.
The second web server maintains a second private cookie at the
browser. App., pp. 12, ll. 2-5, Fig. 2, item 205; pp. 15, ll. 8-9.
The method further comprises accessing a cookie coordinator when the
first private cookie is received by the first web-server. App., pp.
15, ll. 9-12. The method further comprises mapping a first identity
in the first private cookie and a second identity in the second
private cookie to a single identity common across the multiple
domains. App., pp. 15, ll. 12-15. The method further comprises
storing a client record in a database by the first web server. App.,
pp. 13, ll. 6-8, Fig. 3, step 303. See also App., pp. 16, ll. 6-9.
The method further comprises creating a link to the second web server
that encapsulates information about a location of the client record
in the database. App., pp. 13, ll. 8-12, Fig. 3, step 305. See also
App., pp. 16, ll. 12-14, Fig. 5, item 514.

     Claim 21 recites an apparatus comprising a web server interface
to interface with a first web server in a first DNS domain and to
interface a second web server in a second DNS domain. App., pp. 16,
ll. 3-6, Fig. 5, items 510 and 520. Said first web server having a

first user tracker to collect client information and store client
information as a client record in a cookie coordinator database
(App., pp. 16, ll. 6-9, Fig. 5, item 512; see also App., pp. 13, ll.
6-8 and 12-16, Fig. 3, steps 303 and 307), a redirector for the first
web server to direct a client to access a resource at the second web
server (App., pp. 16, ll. 9-11, Fig. 5, item 530; see also App., pp.
13, ll. 16-17, Fig. 3, step 309) and an encapsulator for said
resource to encapsulate information about a location of the client
record in the database (App., pp. 16, ll. 12-14, Fig. 5, item 514;
see also App., pp. 13, ll. 8-12, Fig. 3, step 305). Said second web
server having a second user tracker for the second web server to use
the client record in conjunction with a second user tracking
mechanism (App., pp. 16, ll. 16-19, Fig. 5, item 550; see also App.,
pp. 13, ll. 24-28, Fig. 4, step 405) and a decapsulator for the
second web server to decapsulate a location and retrieve the client
record from the database (App., pp. 16, ll. 14-16, Fig. 5, item 540;
see also App., pp. 13, ll. 22-24, Fig. 4, step 403).

Claim 2 is dependent on claim 1 and recites the first and the
second user tracking mechanisms use cookies for storing the user
client information. App., pp. 11, ll. 23 – pp. 12, ll. 10; pp. 13,
ll. 14-16.

Claim 33 is dependent on claim 2 and recites storing a first cookie
by the first user tracking mechanism, the first cookie including a first
identity. App., pp. 11, ll. 25-28, Fig. 2, item 203; pp. 15, ll. 8-9.
Claim 33 further recites storing a second cookie by the second user
tracking mechanism, the second cookie including a second identity. App.,
pp. 12, ll. 2-6, Fig. 2, item 205; pp. 15, ll. 8-9. The second cookie
correlating the first cookie and the second cookie. App., pp. 12, ll. 8-
10; pp. 12, ll. 18-23. See also App., pp. 15, ll. 12-17.

Claim 34 is dependent on claim 7 and recites coordinating cookies
across said first and second domains comprises storing in the cookies
information correlating a first cookie having a first identity and
associated with the first domain and a second cookie having a second
identity and associated with the second domain. App., pp. 12, ll. 18-23;
pp. 11, ll. 23 – pp. 12, ll. 10; pp. 16, ll. 4-6, Fig. 5, items 510 and

520. See also App., pp. 15, ll. 12-17.

Claim 35 is dependent on claim 18 and recites the first private cookie and the second private cookie store information correlating the first private cookie and the second private cookie. App., pp. 12, ll. 18-23; pp. 15, ll. 12-17.

Grounds for Rejection to be Reviewed on Appeal

I. Claims 1-35 are rejected under 35 U.S.C. §103 as being obvious over U.S. Patent Application Publication No. US 2002/0007317 ("Callaghan") in view of U.S. Patent No. 6,073,241 ("Rosenberg").

Argument

I. CLAIMS 1-35 ARE NOT OBVIOUS OVER CALLAGHAN IN VIEW OF ROSENBERG

In rejecting claims under 35 U.S.C. § 103, the Examiner bears the initial burden of presenting a *prima facie* case of obviousness. In re Rijckaert, 9 F.3d 1531, 1532, 28 USPQ2d 1955, 1956 (Fed. Cir. 1993). A *prima facie* case of obviousness is established by presenting evidence that the reference teachings would appear to be sufficient for one of ordinary skill in the relevant art having the references before him to make the proposed combination or other modification. In re Lintner, 458 F.2d 1013, 1016, 173 USPQ 560, 562 (CCPA 1972). Furthermore, the conclusion that the claimed subject matter is *prima facie* obvious must be supported by evidence, as shown by some objective teaching in the prior art or by knowledge generally available to one of ordinary skill in the art that would have led that individual to combine the relevant teachings of the references to arrive at the claimed invention. In re Fine, 837 F.2d 1071, 1074, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988). Rejections based on § 103 must rest on a factual basis with these facts being interpreted without hindsight reconstruction of the invention from the prior art. The examiner may not, because of doubt that the invention is patentable, resort to speculation, unfounded assumption or hindsight reconstruction to supply deficiencies in the factual basis for the rejection. In re Warner, 379 F.2d 1011, 1017, 154 USPQ 173, 177 (CCPA 1967), cert. denied, 389 U.S. 1057 (1968).

Claim 1

     Claim 1 recites, in part, "the first web server directing a
client to access a resource at the second Web-Server; said resource
encapsulating information about a location of the client record in
the database . . . ." Thus, claim 1 requires that the location of a
client record within a database is encapsulated within a resource
which a client is directed to access. It is emphasized that the
location of the client record, as opposed to the actual information
contained within the client record, must be encapsulated within a
resource to fulfill this limitation of claim 1.

     Claim 1 additionally recites, "the second web server
decapsulating the location and retrieving the client record from the
database . . . ." It is evident due to antecedent basis that the
location listed in this limitation is the same location as in the
preceding limitation. Thus, claim 1 additionally requires that a
second web server decapsulates the location from the resource
encapsulating information about the location of the client record in
the database. As with the preceding limitation, the location of the
client record, as opposed to the actual information contained within
the client record, must be decapsulated from a resource to fulfill
this limitation of claim 1.

     As conceded by the Examiner, Callaghan does not respond to the
limitation of claim 1 requiring a resource encapsulating information
about a location of a client record in a database. The Examiner
similarly concedes that Callaghan does not respond to the limitation
of claim 1 requiring decapsulating the location and retrieving the
client record from the database. However, the Examiner alleges that
Rosenberg teaches these limitations. Specifically, the Examiner
alleges that "Rosenberg teaches the use of a database wherein an
entry is created by a first web server, the entry is identifiable by
a unique identification value and the client record is accessible by
a plurality of servers in the network (col. 5, ll. 5-15)." FOA, pp.
3. The Examiner further alleges that "Rosenberg teaches the
distribution of the unique identification value that identifies the

client record entry in the database to each appropriate server (col. 5, ll. 26-30.) *Id.*

The passage of Rosenberg cited by the Examiner states,

> The server 24A receives the request and determines if it has set a cookie for this browser (step 72). If so, the requested page is simply returned (step 74), in accordance with prior art techniques. If not, the server 24A generates a unique identification value "i" (step 76). The unique identification value is then launched to a database (step 78). The database 25 then creates an 20 [sic] entry for the unique identification value (step 80). As shown in FIG. 1, the database 25 is accessible by each server computer 24 in the network. Thus, the data associated with the unique identification value "i" is accessible by each server computer 24 in the network. Rosenberg, col. 5, ll. 5-16.

> That is, as shown in FIG. 2, the client computer 22 receives the returned page from the server 24A. The header of the returned page includes the cookie with the unique identification information. In addition, the returned page includes an instruction to convey the unique identification information to each server in the network of servers that is operating in accordance with the invention. Rosenberg, col. 5, ll. 24-31.

The Appellant respectfully submits that the cited passages contain no teaching or suggestion of a resource encapsulating information about a location of a client record in a database. While the passages mention a unique identification value, a unique identification value is not inherently equivalent to a location in a database. Furthermore, Rosenberg is devoid of any teaching that the location at which a record is stored in the database corresponds to the unique identification value of the record. It therefore follows that the unique identification value disclosed by Rosenberg cannot teach a resource encapsulating information about a location of a client record in a database as required by claim 1.

The Examiner responds, "Rosenberg teaches in column 5, lines 5-15 the use of a database wherein an entry is created by a first web server and the database entry is identifiable by a unique identification value." FOA, pp. 10. The passage cited by the Examiner is reproduced above. The Appellant respectfully submits that identification is clearly not equivalent to location. Thus, the identification of data and the location of the same data are clearly

distinct properties of the data. It follows that a database entry being identifiable by a unique identification value does not inherently indicate that the unique identification value is equivalent to the location of the database entry. Therefore, a database entry which is identifiable by a unique identification value fails to teach or suggest a resource encapsulating information about a location of a client record in a database as required by claim 1.

The Examiner further alleges, "The database entry is accessible by a plurality of servers within a network by use of the unique identification value." FOA, pp. 10. The Appellant respectfully submits that the database entry being accessible by use of the unique identification value does not inherently indicate that the unique identification value is equivalent to the location of the database entry. As a counterexample, entries in a database could be sequentially accessed until an entry containing a specific unique identification value is found. In this case, the found database entry is accessible by use of the unique identification value even though the unique identification value is clearly not equivalent to the location of the database entry. Therefore, a database entry being accessible by a plurality of servers within a network by use of the unique identification value fails to teach or suggest a resource encapsulating information about a location of a client record in a database as required by claim 1.

The Examiner further alleges, "The unique identification value is used to encapsulate the location of the record or entry within the database." FOA, pp. 10. The Appellant respectfully submits that this allegation is wholly conclusory. The Examiner does not cite any passage of Rosenberg disclosing that the unique identification value is used to encapsulate the location of the record or entry within the database. Furthermore, the Appellant respectfully asserts that Rosenberg is devoid of any teaching or suggestion that the unique identification value is used to encapsulate the location of the record or entry within the database.

The Examiner further alleges, "Appellant argues that a unique identification value is not inherently equivalent to a location in a

database. Examiner does not find this argument persuasive because
Rosenberg, in column 5, lines 10-15, clearly teaches that a unique
identification value identifies an entry in a database. An entry in
a database is equivalent to a location in a database." FOA, pp. 10.
The Appellant respectfully submits that the content of data is
clearly not equivalent to the location of the same data. It follows
that an entry in a database is clearly not equivalent to the location
of the entry in the database. Moreover, Rosenberg recites the word
"entry" in the following context: "The database 25 then creates an
20 [sic] entry for the unique identification value (step 80)."
Rosenberg, col. 5, ll. 11-12. It is evident from the cited passage
that in the instant case, "entry" indicates content created and
stored at the database. Therefore, even if the unique identification
value identifies an entry in a database, the unique identification
value is not inherently equivalent to a location in a database.

     In rejecting the Appellant's arguments the Examiner alleges,
"Rosenberg teaches further on the decapsulation aspect in column 5,
lines 20-25 wherein other servers, a second web server, may retrieve
instructions as to how to access the database entry utilizing the
aforementioned unique identification value." FOA, pp. 11. The
passage cited by the Examiner states,

>   In general, the setting of a cookie (persistent client-side state
>   information) is a known process. However, in accordance with the
>   invention, the returned page includes instructions to convey the
>   unique identification information to additional server computers
>   that are observing the same protocol. That is, as shown in FIG.
>   2, the client computer 22 receives the returned page from the
>   server 24A. Rosenberg, col. 5, ll. 19-26.

     The Appellant respectfully submits that the cited passage fails
to teach or suggest instructions as to how to access the database
entry utilizing the aforementioned unique identification value.
Instead, the passage recites ". . . instructions to convey the unique
identification information to additional server computers . . . ."
Instructions to convey the unique identification information to
additional server computers are not inherently equivalent to

instructions as to how to access the database entry as alleged by the Examiner.

Moreover, the instructions disclosed in the cited passage are included in the returned page. The final sentence of the cited passage clarifies that the client computer receives the returned page. Claim 1 recites, in part, "the first web server directing a client to access a resource at the second Web-Server." The client computer disclosed by Rosenberg cannot be equivalent to the second web server of claim 1 because Rosenberg fails to teach or suggest directing a client to access a resource at the client computer. It follows that the instructions disclosed in the cited passage cannot teach the second web server decapsulating the location and retrieving the client record from the database as is required by claim 1.

For the above reasons, the Appellant respectfully submits that the passage cited by the Examiner fails to teach or suggest a second web server decapsulating the location from the resource encapsulating information about the location of the client record in the database as required by claim 1.

The Examiner further alleges that "[o]ne of ordinary skill in the art at the time of the applicant's invention would have found it useful to modify Callaghan with the teachings of Rosenberg in order to be able to share client record information that is stored in a database. One of ordinary skill in the art would have been motivated to make such a combination for the reasons stated above as well as wherein a user would be able to be tracked across multiple web sites or distinct domains (Rosenberg, col. 2., ll. 25-27)." FOA, pp. 3-4. The Appellant respectfully disagrees with the Examiner's conclusion.

The passage cited by the Examiner recites, "However, it would be even more useful to be able to track a user across multiple web sites. This would allow the collection and correlation of additional customer information." Rosenberg, col. 2, ll. 25-28. However, Callaghan also teaches a method for tracking a user across multiple web sites or distinct domains. Callaghan states,

The shortcomings of the prior art are overcome and additional advantages are provided through the provision of a method of sharing state information. In one example, the method includes determining state information to be shared between a first domain and a second domain, and then, sharing the state information between the first domain and the second domain. The first and second domains are noncooperating.

In one example, the state information is stored within one or more cookies. In a further example, the first domain and the second domain are disjoint domains. Callaghan, para. [0017]-[0018].

The passage cited above clarifies that Callaghan effects sharing state information across multiple web sites. The method of Callaghan is therefore suitable for tracking a user across multiple web sites because each web site can access the shared state information to determine the user's actions and state with regard to the other web sites. Furthermore, each web site can modify the shared state information to communicate the user's actions and state on the present web site to the other web sites.

Furthermore, Callaghan provides an example of collecting and correlating additional customer information. Callaghan states,

In a further embodiment of the invention, a method of electronic shopping is provided. A plurality of items to be purchased is selected electronically from a plurality of vendors. The plurality of vendors are represented by a plurality of web sites. The plurality of items are purchased on-line via a single check out. Callaghan, para. [0023].

In this embodiment, additional customer information, namely a plurality of items to be purchased, is collected from a plurality of web sites. The plurality of items to be purchased are then correlated when purchased together via the single check out. Thus, Callaghan is clearly suitable for collecting and correlating additional user information.

Thus, both Callaghan and Rosenberg teach a method suitable for tracking a user across multiple web sites and for collecting and correlating additional customer information. Additionally, the teachings of Callaghan are by themselves sufficient for this task. Similarly, the teachings of Rosenberg are by themselves sufficient for this task. It follows that combining the teachings of Callaghan

and Rosenberg is redundant because both methods exist to achieve the same object. Therefore, it is illogical to assert that one of ordinary skill in the art would be motivated to combine the teachings of Callaghan with the teachings of Rosenberg.

In rejecting the Appellant's arguments in regards to the previous Office Action, the Examiner alleges, "Callaghan and Rosenberg and [sic] deemed analogous art." The Appellant respectfully submits that the Examiner's allegation is wholly conclusory. The Examiner has not provided a rationale as to why one of ordinary skill in the art would be motivated reconstruct Callaghan in light of Rosenberg.

The Examiner further alleges, "Rosenberg is relied upon for teaching what Callaghan lacks as outlined in the above rejection." FOA, pp. 11. As previously noted, both Callaghan and Rosenberg are, by themselves, suitable for tracking a user across multiple web sites and for collecting and correlating additional customer information. Therefore, Callaghan clearly does not lack any feature which is advantageous for achieving these goals. As such, it is unclear why one would be motivated to reconstruct Callaghan to include the teachings of Rosenberg.

Additionally, the method for coordination of user information as taught by Callaghan requires the use of an intermediary application or proxy server. The proxy server taught by Callaghan intercepts all requests from a client to a plurality of web servers. By contrast, Rosenberg does not disclose a proxy server. An environment having a proxy server is substantially different than an environment lacking a proxy server. Because Callaghan and Rosenberg are designed to operate in substantially different environments, one skilled in the art would not be motivated to combine the teachings of Callaghan with the teachings of Rosenberg.

In rejecting the Appellant's arguments in regards to the previous Office Action, the Examiner alleges, "The argument that the environments that Callaghan and Rosenberg operate in are substantially different is not found persuasive because they are both

intended to operate within networked computer environments and obvious variations thereof as mentioned in column 1, lines 14-30 of Rosenberg and page 1, paragraph 0003 of Callaghan." FOA, pp. 11.

In regards to the proxy server, Callaghan states,

> In accordance with the principles of the present invention, intermediary application 110 receives HTTP requests from the client and returns HTTP responses to the client. The intermediary application also sends HTTP requests to a server (such as one or more of servers 112) and in turn receives HTTP responses. The HTTP requests sent to the server and the HTTP responses returned to the client are created by the intermediary application. Thus, the intermediary application has a great deal of control over the operation of both the client and the server. Callaghan, para. [0048].

It is evident from the passage that clients and servers each directly communicate with the intermediary application disclosed by Callaghan. Absent from Callaghan is any teaching or suggestion that the clients and servers directly communicate with each other. By contrast, Rosenberg does not disclose a proxy server or an intermediary application. Thus, it follows that the clients and servers disclosed by Rosenberg communicate directly with each other. The Appellant respectfully submits that transmitting communication through an intermediary application as disclosed by Callaghan is substantially and qualitatively different than direct communication as disclosed by Rosenberg.

More generally, the Appellant respectfully submits that one skilled in the art would not be motivated to combine Callaghan's teaching of sharing state information across multiple domains with any teaching of encapsulating information about a location of a client record in the database. Callaghan teaches sharing the state information itself among multiple domains. By contrast, a location of a client record in the database provides sufficient detail to access the information but does not itself contain the information. Because the state information of Callaghan is itself being shared, additionally sharing the location of the same information in a database provides no added benefit because the information which can be accessed at the location is already shared. Therefore, no

motivation exists to additionally provide the location of the
information.

     Furthermore, in rejecting claims 11, 14 and 21, the Office
Action alleges the same argument as presented for claim 1. FOA, pp.
3-4. The argument presented above regarding claim 1 applies equally
to claims 11, 14 and 21.

     For at least these reasons, the Appellant respectfully asserts that
the Examiner has not established a *prima facie* case of obviousness for
claims 1, 11, 14 and 21. The Appellant submits that the rejection of
claims 1, 11, 14 and 21 is in error and respectfully requests that the
rejection of claims 1, 11, 14 and 21 be reversed by the honorable Board.

Claims 2-6

     Claims 2-6 are dependent on and further limit claim 1. Since
the rejection of claim 1 is believed in error, the rejections of
claims 2-6 are also believed in error for at least the same reasons
as claim 1.

Claim 7

     Claim 7 recites, in part, ". . . creating a link to the second web
server that encapsulates information about a location of the client record
in the database . . . ." Thus, claim 7 requires that the location of a
client record in a database is encapsulated within a link. It is
emphasized that the location of the client record, as opposed to the
actual information contained within the client record, must be
encapsulated within a link to fulfill this limitation of claim 7.

     In rejecting claim 7, the Office Action alleges that Rosenberg
teaches the limitation of claim 7 cited above. FOA, pp. 5. The Appellant
respectfully disagrees with the Examiner's conclusion.

     As conceded by the Examiner, Callaghan does not respond to the
limitation of claim 7 requiring creating a link to the second web server
that encapsulates information about a location of a client record in a
database. However, the Examiner alleges that Rosenberg teaches these
limitations. Specifically, the Examiner alleges "Rosenberg teaches the
use of a database wherein an entry is created by a first web server, the

entry is identifiable by a unique identification value and the client record is accessible by a plurality of servers in the network (col. 5, ll. 5-15)." FOA, pp. 5. The Examiner further alleges "Rosenberg teaches the distribution of the unique identification value that identifies the client record entry in the database to each appropriate server (col. 5, ll. 26-30.) *Id.* The passages cited by the Examiner are reproduced above regarding claims 1, 11, 14 and 21.

The Appellant respectfully submits that the cited passages contain no teaching or suggestion of a location of a client record in a database which is encapsulated within a link. While the passages mention a unique identification value, a unique identification value is not inherently equivalent to a location in a database. Furthermore, Rosenberg is devoid of any teaching that the location at which a record is stored in the database corresponds to the unique identification value of the record. It therefore follows that the unique identification value disclosed by Rosenberg cannot teach creating a link to the second web server that encapsulates information about a location of the client record in the database as required by claim 7.

In rejecting the Appellant's arguments in regards to the previous Office Action, the Examiner alleges, "Examiner does not find this argument persuasive because Rosenberg, in column 5, lines 10-15, clearly teaches that a unique identification value identifies an entry in a database. An entry in a database is equivalent to a location in a database." FOA, pp. 12. The Appellant respectfully submits that the reasons cited above regarding claims 1, 11, 14 and 21 as to why an entry in a database is not equivalent to a location in a database apply equally to claim 7.

The Examiner further alleges, "As mentioned in column 5, lines 26-30, the unique identification value taught by Rosenberg is utilized by appropriate servers to specifically identify and achieve access to a client record entry in a database and therefore is functionally equivalent to applicant's claimed link." FOA, pp. 12. The passage cited by the Examiner is reproduced above in regards to claims 1, 11, 14 and 21. The Appellant respectfully submits that identification is clearly not equivalent to location. Thus, the identification of data and the location of the same data are clearly

distinct properties of the data. It follows that a unique identification value being utilized to specifically identify a client record entry in a database does not inherently indicate that the unique identification value is equivalent to the location of the client record entry in the database. Therefore, a unique identification value being utilized to specifically identify a client record entry fails to teach or suggest creating a link to the second web server that encapsulates information about a location of the client record in the database as required by claim 7.

Additionally, the Appellant respectfully submits that the client record entry being accessible by use of the unique identification value does not inherently indicate that the unique identification value is equivalent to the location of the client record entry. As a counterexample, entries in a database could be sequentially accessed until an entry containing a specific unique identification value is found. In this case, the found database entry is accessible by use of the unique identification value even though the unique identification value is clearly not equivalent to the location of the database entry. Therefore, a unique identification value being utilized to achieve access to a client record entry in a database fails to teach or suggest creating a link to the second web server that encapsulates information about a location of the client record in the database as required by claim 7.

In rejecting claim 7, the Examiner further alleges a rationale and motivation for combining Callaghan and Rosenberg which is substantially similar to the rationale and motivation presented in the Examiner's argument regarding claims 1, 11, 14 and 21. The reasons presented above regarding claims 1, 11, 14 and 21 as to why combining Callaghan and Rosenberg is not obvious apply equally to claim 7.

For at least these reasons, the Appellant respectfully asserts that the Examiner has not established a *prima facie* case of obviousness for claim 7. The Appellant submits that the rejection of claim 7 is in error and respectfully requests that the rejection of claim 7 be reversed by the honorable Board.

Claims 8-10

Claims 8-10 are dependent on and further limit claim 7. Since the rejection of claim 7 is believed in error, the rejections of claims 8-10 are also believed in error for at least the same reasons as claim 7.

Claims 12 and 15

Claims 12 and 15 are dependent on and further limit claim 1. Since the rejection of claim 1 is believed in error, the rejections of claims 12 and 15 are also believed in error for at least the same reasons as claim 1.

Claims 13 and 16

Claims 13 and 16 are dependent on and further limit claim 7. Since the rejection of claim 7 is believed in error, the rejections of claims 13 and 16 are also believed in error for at least the same reasons as claim 7.

Claim 17

Claim 17 is dependent on and further limits claim 11. Since the rejection of claim 11 is believed in error, the rejection of claim 17 is also believed in error for at least the same reasons as claim 11.

Claim 22

Claim 22 is dependent on and further limits claim 21. Since the rejection of claim 21 is believed in error, the rejection of claim 22 is also believed in error for at least the same reasons as claim 21.

Claim 18

Claim 18 recites, in part, ". . . creating a link to the second web server that encapsulates information about a location of the client record in the database . . . ." It is emphasized that the cited claim limitation is substantially identical to a limitation of claim 7.

In rejecting claim 18, the Examiner alleges that Rosenberg teaches the limitation of claim 18 cited above. The Examiner's argument is

substantially similar to the argument presented regarding claim 7. Thus, the reasons presented above regarding claim 7 apply equally to claim 18.

The Examiner further alleges a rationale and motivation for combining Callaghan and Rosenberg which is substantially similar to the rationale and motivation presented in the Examiner's argument regarding claims 1, 11, 14 and 21. The reasons presented above regarding claims 1, 11, 14 and 21 as to why combining Callaghan and Rosenberg is not obvious apply equally to claim 18.

For at least these reasons, the Appellant respectfully asserts that the Examiner has not established a *prima facie* case of obviousness for claim 18. The Appellant submits that the rejection of claim 18 is in error and respectfully requests that the rejection of claim 18 be reversed by the honorable Board.

Claims 19-20

Claims 19-20 are dependent on and further limit claim 18. Since the rejection of claim 18 is believed in error, the rejections of claims 19-20 are also believed in error for at least the same reasons as claim 18.

Claim 23

Claim 23 is dependent on and further limits claim 1. Since the rejection of claim 1 is believed in error, the rejection of claim 23 is also believed in error for at least the same reasons as claim 1.

Claim 25

Claim 25 is dependent on and further limits claim 7. Since the rejection of claim 7 is believed in error, the rejection of claim 25 is also believed in error for at least the same reasons as claim 7.

Claim 27

Claim 27 is dependent on and further limits claim 11. Since the rejection of claim 11 is believed in error, the rejection of claim 27 is also believed in error for at least the same reasons as claim 11.

Claim 29

Claim 29 is dependent on and further limits claim 14. Since the rejection of claim 14 is believed in error, the rejection of claim 29 is also believed in error for at least the same reasons as claim 14.

Claim 24

Claim 24 is dependent on and further limits claim 1. Since the rejection of claim 1 is believed in error, the rejection of claim 24 is also believed in error for at least the same reasons as claim 1.

Claim 26

Claim 26 is dependent on and further limits claim 7. Since the rejection of claim 7 is believed in error, the rejection of claim 26 is also believed in error for at least the same reasons as claim 7.

Claim 28

Claim 28 is dependent on and further limits claim 11. Since the rejection of claim 11 is believed in error, the rejection of claim 28 is also believed in error for at least the same reasons as claim 11.

Claim 30

Claim 30 is dependent on and further limits claim 14. Since the rejection of claim 14 is believed in error, the rejection of claim 30 is also believed in error for at least the same reasons as claim 14.

Claim 31

Claim 31 is dependent on and further limits claim 18. Since the rejection of claim 18 is believed in error, the rejection of claim 31 is also believed in error for at least the same reasons as claim 18.

Claim 32

Claim 32 is dependent on and further limits claim 21. Since the rejection of claim 21 is believed in error, the rejection of

claim 32 is also believed in error for at least the same reasons as
claim 21.

<u>Claim 33</u>

Claim 33 is dependent on claim 2 and recites, "A method as recited
in claim 2, further comprising: storing a first cookie by the first user
tracking mechanism, the first cookie including a first identity; and
storing a second cookie by the second user tracking mechanism, the second
cookie including a second identity and correlating the first cookie and
the second cookie."

The Examiner alleges that column 5, lines 25-28 of Rosenberg
teaches claim 33. FOA, pp. 9. The passage cited by the Examiner
states,

> That is, as shown in FIG. 2, the client computer 22 receives the
> returned page from the server 24A. The header of the returned
> page includes the cookie with the unique identification
> information. Rosenberg, col. 5, ll. 24-28.

The Appellant respectfully submits that the passage cited by the
Examiner is devoid of any discussion of correlating a first cookie and a
second cookie. Therefore, the cited passage cannot teach or suggest a
second cookie including a second identity and correlating the first cookie
and the second cookie as required by claim 33.

Furthermore, claim 33 requires that the second cookie
correlates the first cookie and the second cookie. In describing
Figure 5, Rosenberg states,

> FIG. 5 illustrates a database entry that corresponds to the
> information of FIG. 3. Note in FIG. 5 that a single entry exists
> for the identification value "123" and the identification value
> "456". Only the identification value "123" is used, thereby
> effectively merging the "i" and "j" entries, as discussed above.
> As in the case of FIG. 3, the data structure of FIG. 5 is
> simplified for the purposes of illustration. Rosenberg, col. 6,
> ll. 52-58.

Figure 5 of Rosenberg shows two identification values, labeled
"ID#1" and "ID#2." However, Rosenberg does not teach that the data
structure shown in Figure 5 is stored in a cookie. Instead, Rosenberg
states that "FIG. 5 illustrates a database entry . . . ." Thus, it is

evident that the data shown in Figure 5, including the two identification values, are stored in a database. Because the data shown in Figure 5 are not stored in a cookie, none of the data shown therein can teach or suggest that the second cookie correlates the first cookie and the second cookie.

Moreover, in describing Figure 7, Rosenberg states,

> FIG. 7 illustrates an example data structure that may be used in the database. The data structure includes content request information from previous visits to the server. That is, there is information regarding the last visit to server A and the content requested during that visit, similarly, there is information regarding the last visit to server B and the content requested during that visit. This information is periodically passed from the individual servers 24 to the database 25. Rosenberg, col. 7, ll. 1-9.

Figure 7 of Rosenberg shows two identification values, labeled "ID#1" and "ID#2." However, Rosenberg does not teach that the data structure shown in Figure 7 is stored in a cookie. Instead, Rosenberg discloses that the data structure shown in Figure 7 may be used in a database. Because Rosenberg does not teach that the data shown in Figure 7 are stored in a cookie, none of the data shown therein can teach or suggest that the second cookie correlates the first cookie and the second cookie.

Furthermore, the Appellants respectfully submit that no other passage of Rosenberg teaches or suggests a second cookie including a second identity and correlating the first cookie and the second cookie as required by claim 33. Moreover, Callaghan fails to teach or suggest a second cookie including a second identity and correlating the first cookie and the second cookie as required by claim 33.

For at least these reasons, the Appellant respectfully asserts that the Examiner has not established a *prima facie* case of obviousness for claim 33. The Appellant submits that the rejection of claim 33 is in error and respectfully requests that the rejection of claim 33 be reversed by the honorable Board.

<u>Claim 34</u>

Claim 34 is dependent on claim 7 and recites, "A method as recited

in claim 7, wherein coordinating cookies across said first and second domains comprises storing in the cookies information correlating a first cookie having a first identity and associated with the first domain and a second cookie having a second identity and associated with the second domain."

The Examiner alleges that column 5, lines 25-28 of Rosenberg teaches claim 34. FOA, pp. 9. The passage cited by the Examiner is reproduced above in regards to claim 33.

The Appellant respectfully submits that the cited passage is devoid of any discussion of correlating a first cookie and a second cookie. Therefore, the cited passage cannot teach or suggest storing in the cookies information correlating a first cookie having a first identity and associated with the first domain and a second cookie having a second identity and associated with the second domain as required by claim 34.

Furthermore, claim 34 requires storing in the cookies information correlating a first cookie and a second cookie. Rosenberg describes Figure 5 at column 6, lines 52-58, which is reproduced above in regards to claim 33. Figure 5 of Rosenberg shows two identification values, labeled "ID#1" and "ID#2." However, Rosenberg does not teach that the data structure shown in Figure 5 is stored in a cookie. Instead, Rosenberg states that "FIG. 5 illustrates a database entry . . . ." Thus, it is evident that the data shown in Figure 5, including the two identification values, are stored in a database. Because the data shown in Figure 5 are not stored in a cookie, none of the data shown therein can teach or suggest storing in the cookies information correlating a first cookie and a second cookie.

Moreover, Rosenberg describes Figure 7 at column 7, lines 1-9, which is reproduced above in regards to claim 33. Figure 7 of Rosenberg shows two identification values, labeled "ID#1" and "ID#2." However, Rosenberg does not teach that the data structure shown in Figure 7 is stored in a cookie. Instead, Rosenberg discloses that the data structure shown in Figure 7 may be used in a database. Because Rosenberg does not teach that the data shown in Figure 7 are stored in a cookie, none of the data shown therein can teach or suggest storing in the cookies information

correlating a first cookie and a second cookie.

Furthermore, the Appellants respectfully submit that no other passage of Rosenberg teaches or suggests storing in the cookies information correlating a first cookie having a first identity and associated with the first domain and a second cookie having a second identity and associated with the second domain as required by claim 34. Moreover, Callaghan fails to teach or suggest storing in the cookies information correlating a first cookie having a first identity and associated with the first domain and a second cookie having a second identity and associated with the second domain as required by claim 34.

For at least these reasons, the Appellant respectfully asserts that the Examiner has not established a *prima facie* case of obviousness for claim 34. The Appellant submits that the rejection of claim 34 is in error and respectfully requests that the rejection of claim 34 be reversed by the honorable Board.

Claim 35

Claim 35 is dependent on claim 18 and recites, "A method as recited in claim 18, wherein the first private cookie and the second private cookie cookie store information correlating the first private cookie and the second private cookie."

The Examiner alleges that column 5, lines 25-28 of Rosenberg teaches claim 35. FOA, pp. 10. The passage cited by the Examiner is reproduced above in regards to claim 33.

The Appellant respectfully submits that the cited passage is devoid of any discussion of correlating a first private cookie and a second private cookie. Therefore, the cited passage cannot teach or suggest that the first private cookie and the second private cookie store information correlating the first private cookie and the second private cookie as required by claim 35.

Furthermore, claim 35 requires that the first private cookie and the second private cookie store information correlating the first private cookie and the second private cookie. Rosenberg describes Figure 5 at column 6, lines 52-58, which is reproduced above in regards to claim 33.

Figure 5 of Rosenberg shows two identification values, labeled "ID#1" and "ID#2." However, Rosenberg does not teach that the data structure shown in Figure 5 is stored in a cookie. Instead, Rosenberg states that "FIG. 5 illustrates a database entry . . . ." Thus, it is evident that the data shown in Figure 5, including the two identification values, are stored in a database. Because the data shown in Figure 5 are not stored in a cookie, none of the data shown therein can teach or suggest that the first private cookie and the second private cookie store information correlating the first private cookie and the second private cookie.

Moreover, Rosenberg describes Figure 7 at column 7, lines 1-9, which is reproduced above in regards to claim 33. Figure 7 of Rosenberg shows two identification values, labeled "ID#1" and "ID#2." However, Rosenberg does not teach that the data structure shown in Figure 7 is stored in a cookie. Instead, Rosenberg discloses that the data structure shown in Figure 7 may be used in a database. Because Rosenberg does not teach that the data shown in Figure 7 are stored in a cookie, none of the data shown therein can teach or suggest that the first private cookie and the second private cookie store information correlating the first private cookie and the second private cookie.

Furthermore, the Appellants respectfully submit that no other passage of Rosenberg teaches or suggests that the first private cookie and the second private cookie store information correlating the first private cookie and the second private cookie as required by claim 35. Moreover, Callaghan fails to teach or suggest that the first private cookie and the second private cookie store information correlating the first private cookie and the second private cookie as required by claim 35.

For at least these reasons, the Appellant respectfully asserts that the Examiner has not established a *prima facie* case of obviousness for claim 35. The Appellant submits that the rejection of claim 35 is in error and respectfully requests that the rejection of claim 35 be reversed by the honorable Board.

Conclusion

In view of the foregoing, Appellant submits that the rejections of Claims 1-35 are improper and respectfully requests that the rejections of Claims 1-35 be reversed by the Board.

Respectfully submitted,

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Claims Appendix

Claim 1. (original) A method comprising:

employing a first web server in a first DNS domain, and a second web server in a second DNS domain, wherein the first web server uses a first user tracking mechanism to collect client information and stores the client information as a client record in a database;

the first web server directing a client to access a resource at the second Web-Server;

said resource encapsulating information about a location of the client record in the database;

the second web server decapsulating the location and retrieving the client record from the database; and

the second web server using the client record in conjunction with a second user tracking mechanism.

Claim 2. (original) A method as recited in 1, wherein the first and the second user tracking mechanisms use cookies for storing the user client information.

Claim 3. (original) A method as recited in 1, wherein the first web server authenticates the client, and the client record includes user authentication data enabling the second web server to use a common sign-on with the sign-on of the first web server.

Claim 4. (original) A method as recited in 1, wherein the first web server stores within the client record at least one parameter which determines at least one characteristic of at least one page to be sent to the client by the second web server.

Claim 5. (previously presented) A method as recited in 4, wherein

said at least one parameter includes at least one user preference.

Claim 6.   (original)   A method as recited in 5, wherein said at least one user preference is related to at least one detected purchasing habit.

Claim 7.   (previously presented)   A method comprising:

employing a first web server in a first DNS domain, and a second web server in a second DNS domain,

enabling said first and second web servers to share cookie information;

coordinating cookies across said first and second domains;

storing a client record in a database by the first web server; and

creating a link to the second web server that encapsulates information about a location of the client record in the database.

Claim 8.   (original)   A method as recited in claim 7, wherein the step of coordinating is performed by a cookie coordinator accessible to said first and second Web-Servers.

Claim 9.   (original)   A method as recited in claim 7, further comprising providing a cookie coordinator accessible to said first and second Web-Servers to perform the step of coordinating.

Claim 10.   (original)   A method as recited in claim 7, wherein the step of enabling includes the first web server setting a first cookie having a first identity and the second web server setting a second cookie having a second identity, and the step of coordinating maps the first and second identities to a third identity shared across said first and second domains.

Claim 11. (original) An apparatus comprising:

means for employing a first web server in a first DNS domain, and a second web server in a second DNS domain, wherein the first web server uses a first user tracking mechanism to collect client information and stores the client information as a client record in a database;

means for the first web server directing a client to access a resource at the second web server;

means for said resource encapsulating information about a location of the client record in the database;

means for the second web server decapsulating the location and retrieving the client record from the database; and

means for the second web server using the client record in conjunction with a second user tracking mechanism.

Claim 12. (original) An article of manufacture comprising a computer usable medium having computer readable program code means embodied therein for causing coordination of a first user tracking mechanism in a first web server and a second user tracking mechanism in a second web-server, the computer readable program code means in said article of manufacture comprising computer readable program code means for causing a computer to effect the steps of claim 1.

Claim 13. (original) An article of manufacture comprising a computer usable medium having computer readable program code means embodied therein for causing coordination of a first user tracking mechanism in a first web server and a second user tracking mechanism in a second web-server, the computer readable program code means in said article of manufacture comprising computer readable program code means for causing a computer to effect the steps of claim 7.

Claim 14. (original) A method comprising:

employing a first user tracker in a first domain, and a second user tracker in a second domain, wherein the first user tracker uses a first user tracking mechanism to collect client information and stores the client information as a client record in a database;

the first user tracker directing a client to access a resource at the second user tracker;

said resource encapsulating information about a location of the client record in the database;

the second user tracker decapsulating the location and retrieving the client record from the database; and

the second user tracker using the client record in conjunction with a second user tracking mechanism.

Claim 15. (original) A program storage device readable by machine, tangibly embodying a program of instructions executable by the machine to perform method steps for tracking users, said method steps comprising the steps of claim 1.

Claim 16. (original) A program storage device readable by machine, tangibly embodying a program of instructions executable by the machine to perform method steps for using cookies, said method steps comprising the steps of claim 7.

Claim 17. (original) A computer program product comprising a computer usable medium having computer readable program code means embodied therein for causing tracking of users, the computer readable program code means in said computer program product comprising computer readable program code means for causing a computer to effect the functions of claim 11.

Claim 18. (previously presented) A method comprising:

employing a first web server in a first DNS domain, and a second web server in a second DNS domain, wherein the first web server maintains a first private cookie at a browser and the second web server maintains a second private cookie at the browser;

accessing a cookie coordinator when the first private cookie is received by the first web-server;

mapping a first identity in the first private cookie and a second identity in the second private cookie to a single identity common across the multiple domains;

storing a client record in a database by the first web server; and

creating a link to the second web server that encapsulates information about a location of the client record in the database.

Claim 19.   (original)   A method as recited in claim 18, further comprising:

using the single identity to look up the identity of users across the different domains, and

the cookie coordinator learning the mapping of the various cookies that are placed independently on the browser by the different servers.

Claim 20.   (original)   A program storage device readable by machine, tangibly embodying a program of instructions executable by the machine to perform method steps for tracking users, said method steps comprising the steps of claim 18.

Claim 21.   (previously presented)   An apparatus comprising:

a web server interface to interface with a first web server in a first DNS domain and to interface a second web server in a second DNS domain;

said first web server having:

a first user tracker to collect client information and store

client information as a client record in a cookie coordinator database;

            a redirector for the first web server to direct a client to
access a resource at the second web server;

            an encapsulator for said resource to encapsulate information
about a location of the client record in the database; and

        said second web server having:

            a second user tracker for the second web server to use the
client record in conjunction with a second user tracking mechanism; and

            a decapsulator for the second web server to decapsulate a
location and retrieve the client record from the database.

        Claim 22. (original) A computer program product comprising a
computer usable medium having computer readable program code means
embodied therein for causing tracking of users, the computer readable
program code means in said computer program product comprising computer
readable program code means for causing a computer to effect the functions
of claim 21.

        Claim 23. (previously presented) A method as recited in claim 1,
further comprising:

        wherein the database is a cookie coordination database; and

        wherein directing the client to access the resource at the second
Web-Server includes sending the client a link to the second Web-Server.

        Claim 24. (previously presented) A method as recited in claim 1,
wherein directing the client to access the resource at the second Web-
Server includes sending a HTTP response code from the first Web-Server
configured to cause the client to be redirected to the second Web-Server
using HTTP redirection.

        Claim 25. (previously presented) A method as recited in claim 7,

wherein the database is a cookie coordination database.

Claim 26. (previously presented) A method as recited in claim 7, further comprising sending a HTTP response code from the first web server configured to cause the client to be redirected to the second web server using HTTP redirection.

Claim 27. (previously presented) An apparatus as recited in claim 11, further comprising:

wherein the database is a cookie coordination database; and

wherein means for the first web server directing the client to access the resource at the second web server includes means for sending the client a link to the second web server.

Claim 28. (previously presented) An apparatus as recited in claim 11, further comprising means for sending a HTTP response code from the first web server configured to cause the client to be redirected to the second web server using HTTP redirection.

Claim 29. (previously presented) A method as recited in claim 14, further comprising:

wherein the database is a cookie coordination database; and

wherein directing the client to access the resource at the second user tracker includes sending the client a link to the resource.

Claim 30. (previously presented) A method as recited in claim 14, further comprising sending a HTTP response code from the first user tracker configured to cause the client to be redirected to the second user tracker using HTTP redirection.

Claim 31. (previously presented) A method as recited in claim 18, further comprising sending a HTTP response code from the first web server configured to cause the client to be redirected to the second web server using HTTP redirection.

Claim 32. (previously presented) A apparatus as recited in claim 21, wherein the redirector is configured to send a HTTP response code from the first web server configured to cause the client to be redirected to the second web server using HTTP redirection. [**"A apparatus" should be "an apparatus". Does the prohibition on amending claims include typos such as this? Of course, if the appeal results in another Non-Final rejection, it could be corrected then.**]

[**?: Claims 33-35 are new as of the amendment of June 17, 2007 which was finally rejected on August 29, 2007. Does this make them previously presented in regards to the Appeal Brief?**]

Claim 33. (previously presented) A method as recited in claim 2, further comprising:

storing a first cookie by the first user tracking mechanism, the first cookie including a first identity; and

storing a second cookie by the second user tracking mechanism, the second cookie including a second identity and correlating the first cookie and the second cookie.

Claim 34. (previously presented) A method as recited in claim 7, wherein coordinating cookies across said first and second domains comprises storing in the cookies information correlating a first cookie having a first identity and associated with the first domain and a second cookie having a second identity and associated with the second domain.

Claim 35. (previously presented) A method as recited in claim 18,

wherein the first private cookie and the second private cookie store
information correlating the first private cookie and the second private
cookie.

Evidence Appendix

None.

Related Proceedings Appendix

None.